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13 fka The Bank of New York, as Trustee for The  
14 Certificateholders CWMBS, Inc., CHL  
15 Mortgage Pass-Through Trust 2006-3  
16 Mortgage Pass-Through Certificates, Series  
17 2006-3*

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 THE BANK OF NEW YORK MELLON FKA  
21 THE BANK OF NEW YORK, AS TRUSTEE  
22 FOR THE CERTIFICATEHOLDERS CWMBS,  
23 INC., CHL MORTGAGE PASS-THROUGH  
24 TRUST 2006-3 MORTGAGE PASS-THROUGH  
25 CERTIFICATES, SERIES 2006-3,

26 Plaintiff,  
27 vs.  
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TRACCIA COMMUNITY ASSOCIATION; SFR  
INVESTMENTS POOL 1, LLC; and NEVADA  
ASSOCIATION SERVICES, INC.,

Defendants.

Case No.: 2:17-cv-01802-JCM-NJK

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY DEADLINES**

[FIRST REQUEST]

29 Plaintiff The Bank of New York Mellon fka The Bank of New York, as Trustee for The  
30 Certificateholders CWMBS, Inc., CHL Mortgage Pass-Through Trust 2006-3 Mortgage Pass-Through  
31 Certificates, Series 2006-3 (**BoNYM**), and Defendants Traccia Community Association (**HOA**) and  
32 SFR Investments Pool 1, LLC (**SFR**), by and through their respective counsel of record, and hereby  
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1 jointly submit this Stipulation and Order to Extend Discovery Deadlines (First Request) pursuant to  
2 LR IA 6-1 and LR 26-4. This is the first stipulation to extend the discovery deadlines set by the  
3 Scheduling Order (ECF No. 28) entered by the Court on October 23, 2017.

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5 **A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED**

6 **1. Rule 26 Disclosures**

7 Plaintiff BoNYM served its Initial Disclosures on October 20, 2017.

8 Defendant HOA served its Initial Disclosures on October 10, 2017

9 Plaintiff BoNYM served its First Supplement to Initial Disclosures on December 1, 2017.

10 Plaintiff BoNYM served its Second Supplement to Initial Disclosures on December 5, 2017.

11 Plaintiff BoNYM served its Third Supplement to Initial Disclosures on December 12, 2017.

12 Plaintiff BoNYM served its Initial Expert Disclosures on December 21, 2017.

13 **2. Written Discovery**

14 Plaintiff BoNYM served its first set of interrogatories, requests for admissions and requests for  
15 production of documents to SFR on November 3, 2017.

16 Plaintiff BoNYM served its first set of interrogatories, requests for admissions and requests for  
17 production of documents to HOA on November 3, 2017.

18 Defendant HOA served its responses to requests for production of documents, response to  
19 requests for admission and answers to interrogatories on December 5, 2017.

20 Defendant SFR served its responses to requests for production of documents, response to  
21 requests for admission and answers to interrogatories on December 7, 2017.

22 Defendant SFR served its first set of interrogatories, requests for admissions and requests for  
23 production of documents on January 17, 2018.

24 **3. Depositions**

25 SFR's Deposition of BoNYM is scheduled for February 16, 2018.

26 BoNYM's Deposition of HOA Trustee Nevada Association Services, Inc. was held on January  
27 19, 2018.

1      **B. STATEMENT OF DISCOVERY REMAINING TO BE COMPLETED**

2      SFR's deposition of BoNYM.

3      BoNYM's deposition of the HOA.

4      The parties reserve the right to conduct any additional discovery.

5      **C. REASONS WHY AN EXTENSION IS REQUIRED**6      SFR has scheduled the deposition for BoNYM for February 16, 2018. The parties are in the  
7      process of meeting and conferring regarding the deposition topics and have agreed that  
8      BoNYM will respond to written discovery in order to potentially limit the deposition topics.9      SFR served written discovery on BoNYM on January 17, 2018. The parties have agreed to  
10     conduct BoNYM's deposition within the second week of March so that BoNYM can respond to  
11     discovery and based upon BoNYM's witness availability.12     **D. PROPOSED SCHEDULE FOR ALL REMAINING DISCOVERY**

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Discovery Cut-Off:	Tuesday, February 20, 2018	<b>March 23, 2018</b>
Dispositive Motions Deadline:	Thursday, March 22, 2018	<b>April 24, 2018</b>
Pretrial Order Deadline:	Monday, April 23, 2018	<b>May 23, 2018</b>

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1        **E. CURRENT TRIAL DATE**2        The court **has not** yet set a trial date.3        Based on the foregoing, the parties respectfully request the court extend the remaining  
4        discovery deadlines, by approximately 30 days.5        The parties make this request in good faith and believe good cause exists for extending these  
6        deadlines.

7        DATED February 2, 2018.

8        **AKERMAN LLP**9        /s/ Tenesa Scaturro Powell  
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17      *The Bank of New York, as Trustee for The*  
18      *Certificateholders CWMBS, Inc., CHL Mortgage*  
19      *Pass-Through Trust 2006-3 Mortgage Pass-*  
20      *Through Certificates, Series 2006-3*8        **BOYACK ORME & TAYLOR**9        /s/Colli McKiever  
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26      *Attorneys for SFR Investments Pool 1, LLC*23        **ORDER**24        **IT IS SO ORDERED:**25          
26        United States Magistrate Judge27        DATED: February 5, 2018